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5255-3-2-15

Attorneys for Defendants and Counter-Defendants
Randall Hough, Bill Goichberg, Bill Hall, Randy Bauer,
Jim Berry, and Karl Kronenberger

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA CHESS
FEDERATION, INC., an Illinois not-for-profit
corporation, RANDAL D. HOUGH, an
individual

Plaintiffs,

v.

SUSAN POLGAR, an individual, GREGORY
ALEXANDER, an individual, and DOES 1-
20, inclusive,

Defendants.

SUSAN POLGAR

Counter-Plaintiff,

v.

BILL GOICHBERG, BILL HALL, RANDY
BAUER, JIM BERY, KARL
KRONENBERGER,

third party defendants,

RANDALL HOUGH,

Counter-Defendant.

No. 3:08-cv-05126-MHP

**DECLARATION OF BILL GOICHBERG
IN SUPPORT OF THIRD-PARTY
DEFENDANTS GOICHBERG, BAUER,
HALL, AND BERRY'S MOTION TO
DISMISS FOR LACK OF PERSONAL
JURISDICTION**

Date: September 28, 2009
Time: 10:00 a.m.
Cttrm: 15, on the 18th Floor
Judge: The Hon. Marilyn Patel

1 I, Bill Goichberg, declare:

2 The following is of my own personal knowledge, unless stated under information and
3 belief, and if called as a witness I would testify as follows:
4

- 5 1. At the time the lawsuit and counter-claims were filed I was on the Board of
6 Directors and the President of the non-profit United States Chess Federation
7 ("USCF"). This is a volunteer position for which I spent about 20 hours per
8 week. Professionally, I am the owner of Continental Chess, Inc., which has no
9 ownership or other special relationship with USCF.
10
11 2. I have resided, as my primary domicile, in New York for my entire life. I have
12 never resided in California.
13
14 3. I have traveled to California on business unrelated to USCF, for chess
15 tournaments for Continental Chess, Inc.; these tournaments are also held in other
16 states. In the last ten or so years I have also traveled to California in 1997 and
17 2007 for USCF Board meetings, and in 2003 for a Delegates meeting. These
18 meetings are held throughout the nation, with no more frequency in California.
19
20 4. To my knowledge, the USCF does not perform any business in California, with
21 the exception of dealing with chess clubs, tournament directors and organizers,
22 and enrolling members that *happen* to be located in California. USCF has the
23 same relationship with clubs, directors, organizers and members in the other
24 states as well.

25 I declare under the laws of the United States of America that the foregoing is true and
26 correct. Executed at Westchester County, New York, on August 24, 2009.

27 
28 Bill Goichberg

PROOF OF SERVICE

5255-3-2-15

United States District Court – Northern District of California – Case No.: 3:08-cv-05126-MHP

I am a resident of the State of California, over the age of 18 years, and not a party to the within action. My business address is CESARI, WERNER AND MORIARTY, 360 Post Street, Fifth Floor, San Francisco, California, 94108. On August 24, 2009, I served the within document:

**DECLARATION OF BILL GOICHBERG IN SUPPORT OF THIRD-PARTY
DEFENDANTS GOICHBERTG, BAUER, HALL, & BERRY'S MOTION TO DISMISS
FOR LACK OF PERSONAL JURISDICTION**

☐ by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m.

☐ by placing the document(s) listed above in a sealed envelope with postage prepaid, in the United States mail San Francisco, California addressed as follows.

☐ by causing personal delivery by _____ of the document(s) listed above to the person(s) at the address(es) set forth below.

☒ by personally hand delivering the document(s) listed above to the person(s) set forth below.

Matt Gonzalez, Esq.
G. Whitney Leigh, Esq.
Matt Springman, Esq.
Gonzalez & Leigh
Two Shaw Alley, Third Floor
San Francisco, CA 94105

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Attorneys for Cross-Claimant: Polgar

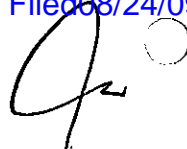
(415) 512-2000 (Telephone)
(415) 512-2001 (Facsimile)

I am familiar with the firm's practice of processing mail. Under that practice it would be deposited with the U.S. Postal Service on that day with postage thereon prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date/postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare under penalty of perjury that the above is true and correct.

Executed on August 24, 2009, at San Francisco, California.

PROOF OF SERVICE



ANNAMARIE DAVIS

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